



Columbus | Cincinnati | Cleveland | New Jersey | New York

Dann
Law

201-355-3440
Direct Telephone

Javier L. Merino, Esq.*

JMerino@DannLaw.com
Email

216-373-0536
Fax

May 10, 2021

Via ECF

Honorable John Michael Vazquez
United States District Judge
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Shana-Kay Medley v. Homebridge Financial Services, Inc.
Case No. 2:21-cv-03255-JMV-MF
Opposition to Request to Stay

Dear Judge Vazquez:

This office represents the Plaintiff, Shana-Kay Medley (“Medley”) in the above-referenced matter against Homebridge Financial Services, Inc. (“Homebridge”, collectively, the “Parties”). Please accept this brief letter in response to Homebridge’s reply letter in support of its request for a stay pending the disposition of Medley’s Bankruptcy matter.

First, Medley vigorously disputes Homebridge’s allegations that it “has reason to believe that [Medley]...is in violation of certain provisions of the loan documents and may have made misrepresentations on loss mitigation applications.” Again, Homebridge has *still* failed to provide any specific details regarding any of Medley’s alleged wrongdoings.

In any event, Medley is willing to enter into a consent order which lifts the automatic stay with regards to Homebridge. This will allow Homebridge to prosecute its (alleged) counterclaims without worry of violating the automatic stay and permit the Parties to litigate this action without further delay.

In light of the above, Medley respectfully requests that Homebridge’s request to stay the instant action be denied.

Respectfully Submitted,

Javier L. Merino, Esq.

NJ Address
372 Kinderkamack Rd Ste 5
Westwood, NJ 07675

DannLaw.com
877-475-8100
*Licensed in NJ and NY

NY Address
42 Broadway, 12th Floor
New York, NY 10007
By Appointment Only



cc: All Counsel of Record